

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

SIEMENS MEDICAL SOLUTIONS
USA, INC., a Delaware corporation,

Plaintiff,

v.

WS ACQUISITION, LLC dba
WESTERN SHELTERS SYSTEMS an
Oregon limited liability company,

Defendant.

Case No. 6:23-cv-01882-MC

**JOINT STATUS REPORT AND
[PROPOSED] CASE SCHEDULE**

Pursuant to the Court’s Scheduling Order dated July 3, 2024 (D.I. 36), as extended by its Order dated July 12, 2024 (D.I. 38), counsel for Plaintiff Siemens Medical Solutions USA, Inc. (“Siemens Healthineers”) and Defendant WS Acquisition, LLC, d/b/a Western Shelters Systems (“WSS”), by and through their respective undersigned counsel of record, hereby submit the following Joint Status Report and Proposed Case Schedule.

I. CASE STATUS

On February 23, 2024, the Court issued its initial Case Management Schedule. D.I. 18. The Court subsequently granted extensions of the deadline for the parties’ Rule 26(f) Conference. D.I. 24, 28. On May 15, 2024, the parties completed their Rule 26(f) conference. The following day, on May 16, 2024, the Court granted WSS’ motion for a stay of discovery pending the hearing on its motion to dismiss. D.I. 30. At the hearing on WSS’ motion to dismiss, the Court extended the stay of discovery through the issuance of its order on WSS’ motion. D.I. 33. On July 3, 2024, the Court issued its Opinion and Order regarding WSS’ motion to dismiss and ordered the parties to submit a Joint Status Report by July 22, 2024.

D.I. 34, 36. On July 12, 2024, on WSS' unopposed motion, the Court extended WSS' deadline to file its answer and the Parties' deadline to file this Joint Status Report. D.I. 37, 38.

On July 31, 2024, WSS filed its Answer and Counterclaims. D.I. 39.

In addition, the parties propose the following case schedule:

Event	Previous Deadline	Proposed Deadline
Defendant's Answer	July 31, 2024	July 31, 2024
Joint Status Report	August 5, 2024	August 5, 2024
Plaintiff's Answer to Counterclaims	---	August 21, 2024
Initial Disclosures	---	August 30, 2024
Joint ADR Report	April 11, 2025	August 30, 2024
Rule 26(f) conference report and discovery plan	---	August 30, 2024
Fact Discovery Deadline	December 15, 2024	March 10, 2025
Opening Expert Reports	January 13, 2025	March 24, 2025
Rebuttal Expert Reports	February 28, 2025	April 28, 2025
Expert Discovery Deadline	March 28, 2025	May 26, 2025
Dispositive Motions and Daubert Motions	April 11, 2025	June 16, 2025
All Other Dates	All subsequent deadlines to be set following the Joint Status Report	All subsequent deadlines, including motions <i>in limine</i> and other pre-trial submissions, to be set following the filing of dispositive motions
Trial	---	September 15, 2025

Dated: August 5, 2024

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